

Pro Se 7 2023

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

James Jackson III  
[Redacted]  
,

CASE NO. 3:24-cv-05290-DGE  
[to be filled in by Clerk's Office]

COMPLAINT FOR EMPLOYMENT  
DISCRIMINATION

Jury Trial:  Yes  No

v.  
Multnomah County  
[Redacted]  
,

Defendant(s).

**I. THE PARTIES TO THIS COMPLAINT**

A. Plaintiff(s)

*Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*

Name	James Jackson III
Street Address	PO BOX 874174
City and County	Vancouver
State and Zip Code	Vancouver 98687
Telephone Number	(971) 407-8888

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1 B. Defendant(s)

2       Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an  
3 individual defendant, include the person's job or title (if known). Attach additional pages if  
needed.

4       Defendant No. 1

Name	Multnomah County
Job or Title ( <i>if known</i> )	Department of Community Justice
Street Address	1120 SW 5th Ave. #404
City and County	Portland
State and Zip Code	Oregon 97204
Telephone Number	(503) 823-3572

5       Defendant No. 2

Name	_____
Job or Title ( <i>if known</i> )	_____
Street Address	_____
City and County	_____
State and Zip Code	_____
Telephone Number	_____

6       Defendant No. 3

Name	_____
Job or Title ( <i>if known</i> )	_____
Street Address	_____
City and County	_____
State and Zip Code	_____
Telephone Number	_____

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1 Defendant No. 4

2 Name \_\_\_\_\_

3 Job or Title (*if known*) \_\_\_\_\_

4 Street Address \_\_\_\_\_

5 City and County \_\_\_\_\_

6 State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

7 C. Place of Employment

8 The address at which I sought employment or was employed by the defendant(s) is:

9 Name	Multnomah County
10 Street Address	1120 SW 5th Ave. #404
11 City and County	Portland (Multnomah)
12 State and Zip Code	Oregon 97204
Telephone Number	(503) 823 - 3572

13 **II. BASIS FOR JURISDICTION**

14 This action is brought for discrimination in employment pursuant to (*check all that*  
15 *apply*):

16  17 Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e  
to 2000e-17 (race, color, gender, religion, national origin).

18 *(Note: In order to bring suit in federal district court under Title VII, you*  
19 *must first obtain a Notice of Right to Sue letter from the Equal*  
*Employment Opportunity Commission.)*

20  21 Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C.  
§§ 621 to 634.

22 *(Note: In order to bring suit in federal district court under the Age*  
23 *Discrimination in Employment Act, you must first file a charge with the*  
*Equal Employment Opportunity Commission.)*

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1       Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112  
 2      to 12117.

3      *(Note: In order to bring suit in federal district court under the  
 4      Americans with Disabilities Act, you must first obtain a Notice of Right  
 5      to Sue letter from the Equal Employment Opportunity Commission.)*

6       Other federal law (*specify the federal law*):  
 7

8       Relevant state law (*specify, if known*):  
 9

10      Relevant city or county law (*specify, if known*):  
 11

### III. STATEMENT OF CLAIM

12     Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as  
 13     possible the facts showing that each plaintiff is entitled to the damages or other relief sought.  
 14     State how each defendant was involved and what each defendant did that caused the plaintiff  
 15     harm or violated the plaintiff's rights, including the dates and places of that involvement or  
 16     conduct. If more than one claim is asserted, number each claim and write a short and plain  
 17     statement of each claim in a separate paragraph. Attach additional pages if needed.

18     Termination of Employment: I was given a performance improvement plan that had no merits and  
 19     was never given an exact reason for being placed on one. I refused to sign the document. I  
 20     believe that signing the performance improvement plan was a condition of my employment and  
 21     unjust. Unequal terms and conditions of my employment: I was given incomplete and insufficient  
 22     training. I was told that I was on probation when I was not on probation, due to being a long term  
 23     employee. Retaliation: I sent an email to HR stating I was not receiving proper training and was  
 24     being treated/managed poorly. I asked for a new supervisor. I believe I was given a performance  
 25     improvement plan as a condition of my employment due to my complaint as there was no prior  
 26     disciplinary action.

A. The discriminatory conduct of which I complain in this action includes (*check all that  
 19     apply*):

20      Failure to hire me.  
 21      Termination of my employment.  
 22      Failure to promote me.  
 23      Failure to accommodate my disability.  
 24      Unequal terms and conditions of my employment.  
 25      Retaliation.

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1            Other acts (*specify*): \_\_\_\_\_

2 B. It is my best recollection that the alleged discriminatory acts occurred on date(s)  
3 \_\_\_\_\_

4 C. I believe that defendant(s) (*check one*):

5            is/are still committing these acts against me.  
6            is/are not still committing these acts against me.

7 D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

8 <input checked="" type="checkbox"/> race	African American
9 <input checked="" type="checkbox"/> color	Black
10 <input checked="" type="checkbox"/> gender/sex	Male
11 <input type="checkbox"/> religion	_____
12 <input type="checkbox"/> national origin	_____
13 <input checked="" type="checkbox"/> age ( <i>year of birth</i> )	( <i>only when asserting a claim of age discrimination.</i> )
14 <input type="checkbox"/> disability or perceived disability ( <i>specify disability</i> )	_____

15 E. The facts of my case are as follows. Attach additional pages if needed.

16 I was hired by Multnomah County on or around 09/25/2002. I performed all my duties of my  
17 most recent job title, Sworn Paroland Probation Community Justice Manager, in a satisfactory  
18 manner.

On 08/27/2023 I sent an email to HR stating I was not being trained properly and requested a  
new manager to properly fulfill my duties.

19           (*Note: As additional support for the facts of your claim, you may attach to this complaint  
20 a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge  
filed with the relevant state or city human rights division.*)

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1           **IV. EXHAUSTION OF FEDERAL ADMINISTRATIVE REMEDIES**

2       A. It is my best recollection that I filed a charge with the Equal Employment Opportunity  
3           Commission or my Equal Employment Opportunity counselor regarding the defendant's  
4           alleged discriminatory conduct on (date)  
5           March 29, 2024

6  
7       B. The Equal Employment Opportunity Commission (*check one*):

8            has not issued a Notice of Right to Sue letter.  
9            issued a Notice of Right to Sue letter, which I  
10           received on (date)  
11           04/04/2024

12           

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*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment  
13           Opportunity Commission to this complaint.)*

14       C. Only litigants alleging age discrimination must answer this question.

15           Since filing my charge of age discrimination with the Equal Employment Opportunity  
16           Commission regarding the defendant's alleged discriminatory conduct (*check one*):

17            60 days or more have elapsed.  
18            less than 60 days have elapsed.

19           **V. RELIEF**

20           State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do  
21           not make legal arguments. Include any basis for claiming that the wrongs alleged are  
22           continuing at the present time. Include the amounts of any actual damages claimed for the acts  
23           alleged and the basis for these amounts. Include any punitive or exemplary damages claimed,  
24           the amounts, and the reasons you claim you are entitled to actual or punitive money damages.  
Attach additional pages if needed.

21           I am seeking relief and damages in the amount of \$752,00.00.

22           My final income as a Sworn Community Justice Manager with Multnomah County was \$113,000.00.  
23           I am seeking damages for lost wages from 2023 through May 20, 2027 (Earliest date for reduced  
24           retirement benefit at age 55 by means of the Oregon PERS system.). I am seeking an additional  
\$300,000.00 in punitive/exemplary for intentional discrimination based on race, age and gender. I  
am seeking damages to cover the mental and emotional distress caused during my employment  
with Multnomah County.

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1                   **VI. CERTIFICATION AND CLOSING**

2                  Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my  
3 knowledge, information, and belief that this complaint: (1) is not being presented for an improper  
4 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
5 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
6 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
7 identified, will likely have evidentiary support after a reasonable opportunity for further  
8 investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
9 Rule 11.

10                 I agree to provide the Clerk's Office with any changes to my address where case-related  
11 papers may be served. I understand that my failure to keep a current address on file with the  
12 Clerk's Office may result in the dismissal of my case.

13                 Date of signing: 04/14/2024

14                 Signature of Plaintiff 

15                 Printed Name of Plaintiff James Jackson III

17                 Date of signing: \_\_\_\_\_

18                 Signature of Plaintiff \_\_\_\_\_

19                 Printed Name of Plaintiff \_\_\_\_\_

21                 Date of signing: \_\_\_\_\_

22                 Signature of Plaintiff \_\_\_\_\_

23                 Printed Name of Plaintiff \_\_\_\_\_